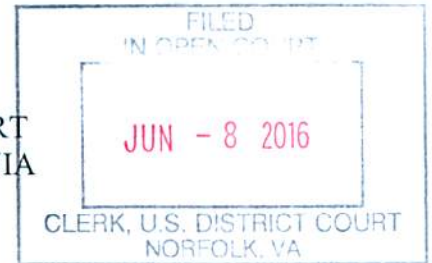


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division



UNITED STATES OF AMERICA

v.

MARCUS D. WILKINS,

Defendant.

)
) Criminal No. 2:16cr 84
)
) 18 U.S.C. § 641
) Theft of Government Property
) (Count One)
)
) 18 U.S.C. § 661
) Theft within the Special Maritime and
) Territorial Jurisdiction
) (Count Two)
)
) 18 U.S.C. § 111
) Assault on a Federal Officer
) (Count Three)
)
) 18 U.S.C. § 113
) Assault within the Special Maritime and
) Territorial Jurisdiction
) (Count Four)

INDICTMENT

June 2016 Term -- At Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Theft of Government Property)

On or about May 1, 2016, in the Eastern District of Virginia, the defendant, MARCUS D. WILKINS, willfully and knowingly did steal, purloin, and knowingly convert to his use goods and property of the United States and a department and agency thereof, of a value of over \$1,000, to wit: a Call of Duty game system for PlayStation 4, four WW brand scented candles, two Bose brand headphones, a PlayStation cordless controller, a NBA 2K16 game for

PlayStation 4, a Madden NFL16 game for PlayStation 4, and a black North Face Recon backpack.

(In violation of Title 18 United States Code, Section 641.)

COUNT TWO

(Theft within the Special Maritime and Territorial Jurisdiction)

On or about May 1, 2016, in the Eastern District of Virginia, and within the special maritime and territorial jurisdiction of the United States, that is, on Naval Air Station Oceana, Virginia Beach, Virginia, on land acquired for the use of the United States and under its concurrent jurisdiction, the defendant, MARCUS D. WILKINS, did take and carry away, with intent to steal and purloin, the personal property of another, that is, merchandise belonging to the Naval Air Station Oceana Navy Exchange, of a value exceeding \$1,000, to wit: a Call of Duty game for PlayStation 4, four WW brand scented candles, two Bose brand headphones, a PlayStation cordless controller, a NBA 2K16 game for PlayStation 4, a Madden NFL16 game for PlayStation 4, and a black North Face Recon backpack.

(In violation of Title 18, United States Code, Sections 7(3) and 661.)

COUNT THREE

(Assault on a Federal Officer)

On or about May 1, 2016, in the Eastern District of Virginia, the defendant, MARCUS D. WILKINS, using a dangerous weapon and inflicting bodily injury, did forcibly assault, resist, oppose, impede, intimidate, and interfere with a person designated in Section 1114 of Title 18, United States Code, specifically, G.P., an officer of the United States and of any agency in any branch of the United States Government, who was, at the time, engaged in the performance of his official duties, and such acts by the defendant involved physical contact with the victim of

that assault.

(In violation of Title 18, United States Code, Sections 111(a)(1) and (b).)

COUNT FOUR

(Assault within the Special Maritime and Territorial Jurisdiction)

On or about May 1, 2016, in the Eastern District of Virginia, at a place within the special maritime and territorial jurisdiction of the United States, namely on Naval Air Station Oceana, Virginia Beach, Virginia, on land acquired for the use of the United States and under its concurrent jurisdiction, the defendant, MARCUS D. WILKINS, did assault G.P., with a dangerous weapon, to wit: a motor vehicle, with the intent to do bodily harm.

(In violation of Title 18, United States Code, Sections 7(3) and 113(a)(3).)

UNITED STATES OF AMERICA v. MARCUS D. WILKINS

CRIMINAL NUMBER 2:16CR 84

A TRUE BILL:

Redacted

FOREPERSON

Dana J. Boente
UNITED STATES ATTORNEY

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